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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

MOTION OF THE EIA/ATV COMMITTEE
FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46 (1990), the EIA/ATV Committee hereby requests that the Commission extend the deadline for submission of reply comments in the above-captioned proceeding.¹ The current schedule calls for reply comments to be submitted by January 20, 1992.² The EIA/ATV Committee requests that the deadline be extended by six weeks, that is, until March 2.

The EIA/ATV Committee is mindful of the general rule that motions for extension of time are not routinely granted. 47 C.F.R. § 1.46(a)(1990). The circumstances underlying the Committee's motion are anything but routine.

1/ The EIA/ATV Committee is an organization sponsored by the Electronics Industries Association but not limited to EIA members. It seeks to promote dialogue and consensus among a wide variety of electronics interests, including manufacturers of consumer electronics, cable, satellite, and other equipment, as well as providers of video delivery services.

2/ Notice of Proposed Rulemaking, MM Docket No. 87-268, 6 FCC Rcd. 7024, 7034 (¶ 48)(1991).

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The Commission needs no reminder of the unusual importance of this docket. The advent of advanced television ("ATV") will radically alter the production, transmission, reception, and display of video programming. Whole industries may be profoundly changed, and the effects of the Commission's public policy decisions will be felt by literally 250 million citizens.

The issues surrounding ATV are as complex as they are important. The Commission's recognition of this complexity is reflected in the issuance during the past four years of a Notice of Inquiry, a Tentative Decision and Further Notice of Inquiry, a First Report and Order, and now a Notice of Proposed Rulemaking. The Commission has also taken the rare step of establishing a blue-ribbon advisory committee, with able leadership, broad participation, and an ambitious agenda.

The Notice seeks comments on a range of challenging issues relating to various aspects of the transition from today's NTSC environment to tomorrow's world of ATV. These issues include such matters as eligibility for ATV broadcast licenses, ATV channel allotments and assignments, patent licensing, and compatibility between broadcast and other media. The range of issues presented has been further broadened in comments submitted by broadcasters, other delivery media, manufacturers, academics, and many others.

In relation to the importance and complexity of the issues, the deadlines established by the Notice for the submission of comments and reply comments are quite brief. First-round comments were required to be submitted only 42 days after the Notice was released for review by interested parties. Under the present schedule, reply comments must be filed only 31 days later. This challenge is made more formidable because the reply period coincides with those December and January weeks which are most hectic for many individuals and organizations, especially those in the electronics industry.³

In this instance, preparation of reply comments is further complicated by the number and length of the first-round comments. Over fifty pleadings -- mostly thoughtful, many lengthy -- were filed by approximately 150 keenly interested individuals and organizations. The EIA/ATV Committee requires additional time to review these comments, consider the information and reasoning they present, and then formulate and communicate a response.

The EIA/ATV Committee believes that its request will not prejudice the interests of other parties.⁴ Indeed,

^{3/} The Electronic Industries Association's Consumer Electronics Group's Winter Consumer Electronics Show, by far the industry's biggest annual event, just concluded yesterday in Las Vegas, Nevada. Despite the recession, attendance was an impressive 75,000. Planning for the Show requires months of effort by dozens of individuals in hundreds of companies.

^{4/} Of special importance, the requested delay would not impede in any fashion the continuing development of ATV technology (Footnote 4 continued on next page)

it is likely that other parties would likewise find it advantageous to have additional time in which to develop and articulate their views. The Commission, too, would benefit if (as is likely) an allowance of additional time were to lead to increased quality in the reply pleadings or to contribute further to the development of intra- and inter-industry consensus.

For the reasons given above, the EIA/ATV Committee respectfully requests that the Commission extend the date for filing reply comments in this proceeding until March 2, 1992.

Respectfully Submitted,


EIA/ATV Committee

By: Peter F. McCloskey,
President
Electronic Industries Association

By: Sidney Topol,
Chairman, EIA/ATV Committee and
Vice Chairman, The Monitor Channel

By: Guy W. Numann,
Chairman, EIA/ATV Committee Drafting
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January 13, 1992

(Footnote 4 continued from previous page)
by system proponents and others or the testing of ATV systems
by the Advance Television Test Center.